

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

420 Lexington Avenue • Suite 2525 • New York, New York 10170  
T: 212.792-0048 • E: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

September 2, 2020

**Via Electronic Filing**

The Honorable Magistrate Judge Steven M. Gold  
U.S. District Court Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:** *Singh v. Lintech Electric, Inc. et al*  
**Case No.: 1:18-cv-05780-FB-SMGJO**

Dear Honorable Magistrate Judge Gold:

This law firm represents Defendants Lintech Electric, Inc. (the “**Company**”), and Linden J. Tudor (“**Mr. Tudor**”, and together with the Company, the “**Defendants**”) in the above-referenced action.

This law firm also represents Defendants Holly Tudor, Linden Tudor and Tudor Enterprise Family Limited Partnership in the removed state court actions captioned *Singh v. Holly Tudor et al* (Index No. 720551-2019) (the “**First Removed State Court Action**”) and *Singh v. Tudor Entr. Family Ltd Partnership et al* (Index No.: 526826-2019) (the “**Second Removed State Court Action**”, and together, the “**Removed State Court Actions**”).

Pursuant to Your Honor’s Individual Practice Rule 1(D), this letter respectfully serves to request an extension of the deposition completion deadline of September 15, 2020, to, through and including, October 30, 2020. Four prior requests to extend the deadline to complete fact discovery were previously made and granted. [See Dckt. Nos. 24, 28, 34, 43]. Plaintiff’s counsel did not consent to this request, and did not communicate a basis for refusing to consent.

The basis of the request is that the undersigned law firm will have limited availability in observance of the Jewish high holidays of Rosh Hashana, Yom Kippur, Sukkot, Shemini Atzeret and Simchat Torah. The undersigned law firm anticipates being able to complete depositions on or before October 30, 2020.

This request, if granted, would necessitate an adjournment of the Settlement Conference scheduled for September 22, 2020. Thus, Defendants also request an adjournment of the September 22, 2020 Settlement Conference to a date and time set by the Court after October 30, 2020. This is the first request of its nature, and is not made on consent of Plaintiff’s counsel, who did not communicate a basis for refusing to consent.

In light of the foregoing, Defendants respectfully request: (i) an extension of the deposition completion deadline of September 15, 2020, to, through and including, October 30, 2020; and (ii) an adjournment of the September 22, 2020 Settlement Conference to a date and time set by the Court after October 30, 2020.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Defendants*

VIA ECF: All Counsel